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7	Attorneys for Defendant Synchrony Bank		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	CECILIA RAMOS,	Case No.: 2:15-cv-00191-GMN-PAL	
11	Plaintiff,	STIPULATED MOTION TO EXTEND	
12	vs.	TIME FOR DEFENDANT SYNCHRONY BANK TO ANSWER OR OTHERWISE	
13	BANK OF AMERICA, N.A., CAPITAL ONE	PLEAD	
14	BANK, N.A., MACY'S, INC., DEPARTMENT STORES NATIONAL BANK, R.C.WILLEY		
15	HOME FURNISHINGS, SYNCHRONY BANK, WELLS FARGO FINANCIAL NEVADA, INC.,		
16	and EQUIFAX INFORMATION SERVICES, LLC.		
17	Defendants.		
18	-		
19	Plaintiff Cecilia Ramos ("Plaintiff") and Defendant Synchrony Bank ("Synchrony"), by		
20	and through counsel, hereby stipulate to an extension of time of 30 days, up to and including		
21	May 11, 2015, for Synchrony to answer or otherwise respond to Plaintiff's Complaint for		
22	Damages Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et. seq. ("Complaint").		
23	1. Plaintiff's Complaint was filed February 3, 2015. [Doc. 1]		
24			
25	2. On February 9, 2015, Plaintiff mailed a Waiver of Service of the Summons to		
26	Synchrony.		
27			

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1	3. On April 1, 2015, Plaintiff filed a waiver of service signed by counsel for		
2	Synchrony on March 9, 2015. [Doc. 11]		
3	4. The parties have agreed to an extension of time of 30 days for Synchrony to		
4	answer or otherwise respond	to Plaintiff's Complaint.	
5			
6	The parties therefore respectfully request that this Court enter an order granting an		
7	extension of time of 30 days, up to and including May 11, 2015, for Synchrony to answer or		
8	otherwise plead.		
9	Dated: April 10, 2014		
10	Respectfully submitted,		
11			
12		/s/ Matthew Knepper	
13		DARREN T. BRENNER, ESQ. Nevada Bar No. 8386	
14		NATALIE L. WINSLOW, ESQ. Nevada Bar No. 12125	
15		MATTHEW I. KNEPPER Nevada Bar No. 12796	
16	HAINES & KRIEGER, LLC	1160 Town Center Drive, Suite 330 Las Vegas, Nevada 89144	
17	8985 S. Eastern Avenue, Suite 130	Attorneys for Defendant Bank of America, N.A.	
18	2 1 0 2 2 2 2		
19	Attorneys for Plaintiff		
20	IT IS SO ORDERED:		
21			
22	DATED: April 21, 2015	U.S. MAGISTRATE JUDGE	
23		PEGGY A. LEEN	
24			
25			
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